

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 20, 2010.

Permit Number: **R30-00100100-2010**
Application Received: **April 18, 2012**
Plant Identification Number: **03-54-00100100**
Permittee: **Dominion Transmission, Inc.**
Facility Name: **Pepper Compressor Station**
Mailing Address: **445 West Main Street; Clarksburg WV 26301**

Permit Action Number: *SM02* Revised: *October 8, 2013*

Physical Location:	Belington, Barbour County, West Virginia
UTM Coordinates:	574.20 km Easting • 4,337.79 km Northing • Zone 17
Directions:	Interstate 79 North to the Nutter Fort exit. Turn right off the exit ramp onto Rt 20. Continue approximately 6 miles until turning left onto Rt 57. Stay on Rt 57 for approximately 10 miles then turn left onto Stewarts Run (CR18). Stay on Stewarts Run until turning left onto Brushy Fork Road (CR-7). Stay on Brushy Fork for 1 mile, station will be on right.

Facility Description

The Pepper Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922.

This modification includes both Minor modification (MM01) and Significant Modification (SM02). Instead of installing the Generac Auxiliary Set (EN04) that was permitted under R13-2688 a Cummins Generator Set (EN05) will be installed as permitted under R13-2688A.

Emissions Summary

As a result of this modification, there will be an increase in emissions of 0.01 TPY of PM and PM₁₀, 0.41 TPY of NO_x, 0.27 TPY of CO, 0.01 TPY of VOC, 0.06 TPY of Formaldehyde, and 0.09 TPY of Total HAPs.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 235.82 TPY of NO_x. Due to this facility's potential to emit over 100 tons per year of NO_x, Pepper Compressor Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13 45CSR16 45CSR30 40CFR60, Subpart JJJJ 40CFR63, Subpart ZZZZ	Preconstruction Permits for Minor Sources Standards of Performance for New Stationary Sources Operating permit requirement. NSPS for Stationary Spark Ignition ICE Reciprocating Internal Combustion Engines MACT
State Only:	45CSR4	Odors

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2866A	July 22, 2013	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made to the Title V permit:

1. In “**1.1 Emission Units,**” the Generac Auxiliary Generator Set (EN04) was replaced with a Cummins Generator Set (EN05).
2. Conditions 3.1.11 and 3.5.10 – According to Director’s directive, 45CSR42 (Greenhouse Gas Emissions Rule) requirements were deleted.
3. In condition 3.5.3. US EPA’s address was updated.
4. In condition 4.1.1., the following changes were made to reflect changes made in R13-2688A:
 - a. For EN03, the pollutants Total particulate matter, PM₁₀, and Sulfur Dioxide were removed from the table.
 - b. The Generac Auxiliary Generator Set (EN04) emission source was removed from the table.
 - c. The Cummins Generator Set (EN05) emission source was added to the table.
5. In condition 4.1.2, EN04 and its maximum amount of pipeline quality gas were replaced with that of EN05.
6. In condition 4.1.8., EN04 was changed to EN05 and the use of a twelve month rolling total was added.
7. Condition 4.1.14. was added to reflect changes in R13-2688A and to include the lifetime emission standards for EN03 and EN05.
8. Condition 4.1.15. was added to reflect changes in R13-2688A and requires a non-resettable meter be installed for EN05.
9. Condition 4.1.16. was added to reflect changes in R13-2688A and limits the hours of maintenance checks and readiness testing per year for EN05.
10. Conditions 4.1.17, 4.1.18, and 4.1.19 were added because they are applicable compliance requirements for EN05 from 40CFR60 Subpart JJJJ.
11. Removed the content of condition 4.2.1. since it pertained to EN04 which has been replaced with EN05. EN05 has a similar condition in the recordkeeping section of the permit.
12. Condition 4.4.3. was changed to “*Reserved*” after content was removed for the following reasons.
 - a. Minor modification (MM01) requested that this condition be removed since 40 C.F.R. §60.4243(a)(2)(ii) lists compliance requirements under 40CFR60 Subpart JJJJ for non-certified engines. EN04 was a certified engine.
 - b. For significant modification (SM02) EN04 was replaced by EN05 which is a certified engine and not subject to this condition.
13. In condition 4.4.5., EN04 was removed and EN03 was added. This was done to reflect changes made in R13-2688A.
14. Conditions 4.4.6. and 4.4.7. were added to reflect changes made in R13-2688A which provide the record keeping requirements for EN05.

15. Condition 4.4.8. was added because it is an applicable record keeping requirement for engines EN03 and EN05 from 40 C.F.R. 60, Subpart JJJJ.
16. Condition 4.4.9. was added because it is an applicable record keeping requirement for engine EN05 from 40 C.F.R. 60, Subpart JJJJ.
17. The following conditions have had changes made to their citations due to changes in numbering in R13-2688A: 3.4.1, 4.1.9, 4.3.1, 4.3.2, 4.4.1, 4.4.2, 4.4.5, 4.5.1, 4.5.2.
18. Engine EN05 meets the requirements of 40 C.F.R. 63, Subpart ZZZZ by meeting the requirements of 40 C.F.R. 60, Subpart JJJJ per 40 C.F.R. §63.6590(c).

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. 45CSR27 – Toxic Air Pollutants

This facility does exceed the threshold of formaldehyde as described in 45CSR27. However, the process does not meet the definition of “Chemical Processing Unit” in Rule 27, and therefore is not subject to this rule.

2. Greenhouse Gas Tailoring Rule

This is a modified Title V Permit and there have been no modifications that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

3. 40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)

The only new or modified equipment under this modification is EN05 which has no controls.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: August 21, 2013
Ending Date: September 20, 2013

All written comments should be addressed to the following individual and office:

Robert Mullins
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.